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In my view this document will not add to the credibility of the LAC and fails on almost every count as a "call to action".

To begin with the most basic - it is written in horrible bureaucratic prose that renders it nearly incomprehensible, sentence after sentence. At no point does it clearly state that Canadians are primarily creating and using information in digital form; that this information will, if current circumstances continue, be largely lost in 30-50 years; and that Canadians lack usable access to large parts of their cultural heritage, to the legal, medical and financial information to which they are entitled, and to the knowledge that will preserve Canada's competitiveness and productivity in the future. It is at least 50% longer than it needs to be given its current content.

It contains almost no actual facts and hence provides no baselines against which to measure if any of the "strategies" are successful and recommends no mechanisms for on-going evaluation. The near total lack of research underlying the report is not at all helped by the 20 pages of unannotated and rarely referenced citations to reports from other countries which suggest a failure of research rather than serving as a valuable addendum. I admit I'm shocked that concrete data about the extent of these problems is missing from this report; I learned nothing new at all from reading it, which is one thing I would expect anyone in the field who received such a report to be able to do, and one of the motivations someone would have for taking its recommendations seriously.

Finally, and of course most importantly, the "strategies" it advances are almost all not strategies at all, and few of them could, in my view, conceivably make very much difference to the overall state of Canadian digital content in the next decade. With the exception of mass digitization (carried out largely by others, with money from others, and yet with guidelines that are not yet established but will presumably be dictated by the LAC) it contains almost no explicit recommendations for action. I'm sorry, but I don't think a strategy document whose "actions" include one to develop strategies, and most of which are to encourage things (including many things you can simply do if you wanted to), is credible.

All this is unfortunate because there are some good ideas lurking in here that could be brought out. It might require some courage to state them clearly and it could offend some of those whose work (often called out in little boxes throughout the report), is in fact quite worthless. But I think you could do it, and make a difference.

For the three objectives, I'd suggest three overarching strategies which require concrete action by the LAC:

To strengthen content, LAC should **publicly declare Canadian content metadata** so that its digital capture can be monitored by public awareness of its existence. Such a strategy ensures capture of the current digital records of government by instantaneous publication of metadata describing every government record at the time of its creation, and a process for systematically making past records of government available in digital form as they are requested by users, with a register of user requests (user-identity privacy respected) and their fulfillment, including all FOI requests government-wide. Such a register would also be a scorecard of the success of mass digitization of Canadian publications: textual audio and video.

To ensure preservation, LAC should **build an infrastructure that makes long-term preservation possible**. Frankly, I don't think it has, and anything short of actually doing it is simply passing the buck. Such a strategy requires LAC to build an infrastructure for deployment of Permanent url's, require DOI's of everything published in Canada, provide for certification of public and private archives, and support redundant storage and registration of copies of content at repositories nation-wide.

To maximize access, LAC should make **freely available in electronic form all past, current and future Canadian government publications and records**. This means advocating revision of the Crown copyright doctrine and addressing the systematic digital capture and online publication of out of copyright texts, creating a legal regime for publishing orphan works and reimbursing claimants after the fact, requirements for publicly funded research to be made openly available, and a set of policies (not unlike the public lending right as applied to library loans) to encourage provision of online access to all contemporary published works, including audio and visual works.

In addition, to promote access, you should annually publish an assessment of the degree to which Canada's information providers and governmental policies **make digital services ubiquitous and functional** including its success at implementing an infrastructure for location-aware knowledge delivery, a framework for competitive telecommunications services nationwide with regulatory requirements for openness to new services and provision of value-added information services as a public good.